

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

PAUL BROWN,

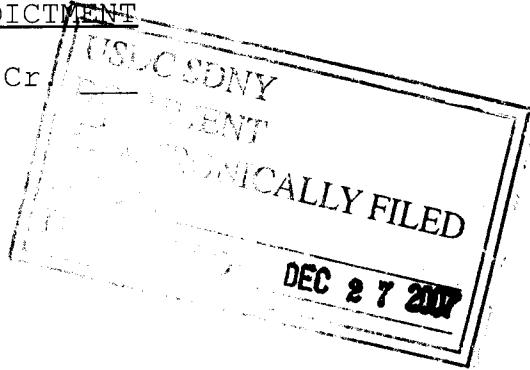
Defendant.

- - - - - x

07CRIM1223

INDICTMENT

07 Cr



COUNT ONE

The Grand Jury charges:

1. In or about September 2006, in the Southern District of New York and elsewhere, PAUL BROWN, the defendant, and others known and unknown, unlawfully, intentionally, and knowingly combined, conspired, confederated, and agreed together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that PAUL BROWN, the defendant, and others known and unknown, would and did distribute, and possess with intent to distribute, a controlled substance, to wit, 50 grams and more of mixtures and substances containing a detectable amount of cocaine base in a form commonly known as "crack," in violation of Title 21, United States Code, Sections 812, 841(a)(1), and 841(b)(1)(A).

Overt Act

3. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt act, among others, was committed in the Southern District of New York and elsewhere:

a. On or about September 25, 2006, in the Bronx, New York, PAUL BROWN, the defendant, provided an individual with a quantity of "crack" cocaine.

(Title 21, United States Code, Section 846.)

COUNT TWO

The Grand Jury further charges:

4. On or about September 20, 2006, in the Southern District of New York, PAUL BROWN, the defendant, unlawfully, intentionally, and knowingly, did distribute and possess with intent to distribute a controlled substance, to wit, fifty grams and more of mixtures and substances containing a detectable amount of cocaine base in a form commonly known as "crack."

(Title 21, United States Code, Sections 812, 841(a)(1) and 841(b)(1)(A); Title 18, United States Code, Section 2.)

COUNT THREE

The Grand Jury further charges:

5. On or about September 25, 2006, in the Southern District of New York, PAUL BROWN, the defendant, unlawfully, intentionally, and knowingly, did distribute and possess with intent to distribute a controlled substance, to wit, fifty grams

and more of mixtures and substances containing a detectable amount of cocaine base in a form commonly known as "crack."

(Title 21, United States Code, Sections 812, 841(a)(1) and 841(b)(1)(A); Title 18, United States Code, Section 2.)

FORFEITURE ALLEGATION

6. As a result of committing the controlled substance offenses alleged in Counts One, Two, and Three of this Indictment, PAUL BROWN, the defendant, shall forfeit to the United States pursuant to 21 U.S.C. § 853, any and all property constituting or derived from any proceeds the said defendant obtained directly or indirectly as a result of the said violations and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violations alleged in Counts One, Two, and Three of this Indictment, including but not limited to proceeds obtained as a result of the offenses described in Counts One, Two, and Three of this Indictment.

SUBSTITUTE ASSETS PROVISION

7. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;

c. has been placed beyond the jurisdiction of the Court;

d. has been substantially diminished in value;

or

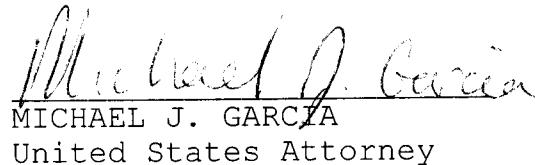
e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 21, United States Code, Sections 846 and 853.)



Jennifer Winters  
FOREPERSON



Michael J. Garcia  
MICHAEL J. GARCIA  
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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Defendant.

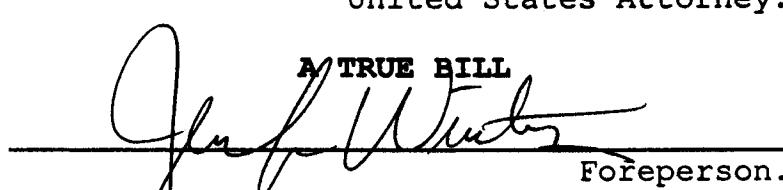
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INDICTMENT

(Title 21, United States Code,  
Sections 812, 841(a)(1), 841(b)(1)(A),  
and 846)

MICHAEL J. GARCIA  
United States Attorney.

A TRUE BILL

  
Foreperson.

12/27/07

